

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

KAIFI LLC,

Plaintiff,

v.

VERIZON COMMUNICATIONS, INC., ET  
AL.

Defendants.

Case No. 2:20-cv-00280-JRG

JURY TRIAL DEMANDED

Honorable Rodney Gilstrap

**UNOPPOSED MOTION TO AMEND DOCKET CONTROL ORDER**

Plaintiff KAIFI LLC (“KAIFI”) respectfully submits this Unopposed Motion to Amend the Docket Control Order and would show the Court the following:

KAIFI respectfully requests that the following deadlines be extended:

Current Deadline	Proposed Deadline	Event
October 15, 2021	October 22, 2021	Serve Disclosures for Rebuttal Expert Witnesses
September 24, 2021	October 1, 2021	Serve Disclosures for Expert Witnesses by the Party with the Burden of Proof
September 17, 2021	September 24, 2021	Deadline to Complete Fact Discovery and File Motions to Compel Discovery

These extensions will not affect any other deadlines in the Docket Control Order.

WHEREFORE, Plaintiff respectfully requests that the Court extend the deadlines above and enter the attached Second Amended Docket Control Order.

Date: September 16, 2021

/s/Prashanth Chennakesavan

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was served via electronic mail on September 16, 2021, to all opposing counsel of record.

/s/ Prashanth Chennakesavan

Counsel

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule CV-7(h), Counsel for Plaintiff Prashanth Chennakesavan met and conferred with Counsel for Defendants Kevin Anderson on September 15, 2021, regarding the referenced motion. Defendants are unopposed to the above motion.

/s/ Prashanth Chennakesavan

Counsel